

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

In re)	
)	
Michael Edward Block and)	
Caryn Michele Block)	
)	Case No. 09-16786-SSM
Debtors.)	Chapter 13
_____)	
)	
Michael Edward Block and)	
Caryn Michele Block)	
)	
Plaintiffs)	
)	
v.)	
)	Adv. Pro. No. 09-01454-SSM
BAC HOME LOANS SERVICING, LP,)	
)	
BROKER SOLUTIONS, INC.)	
d/b/a NEW AMERICAN FUNDING,)	
)	
and)	
)	
MORTGAGE ELECTRONIC)	
REGISTRATION SYSTEMS, INC.)	
)	
Defendants)	
_____)	

REQUEST FOR ENTRY OF DEFAULT

TO THE CLERK:

NOW COME the Plaintiffs, through counsel, and request that the Clerk of the Court enter the Default of Defendants, and in support thereof, submit the following:

1. Defendants were served with the Summons and Complaint in the above captioned case by first class mail, directed, in the case of Defendants BROKER

Daniel M. Press, VSB# 37123
Russell B. Adams III, VSB# 37302
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
Counsel for Debtors

SOLUTIONS, INC. and MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., to their registered agents, and in the case of BAC HOME LOANS SERVICING, LP, to (a) its address on its proof of claim; (b) its attorneys of record on its proof of claim, (c) an officer (assistant vice-president) of its general partner, and (d) by certified mail, return receipt requested pursuant to Bankr. R. 7004(h), on the President of Bank of America, N.A. (a federally chartered insured depository institution), the managing member of the general partner LLC, as reflected in the returns of service previously filed herein as Docket Entries 4-9 (with the return receipt attached to #4). The summons was issued on December 30, 2009, and was timely served that same day.

2. Pursuant to Bankr 7012(a), the said Defendants were required to answer or otherwise respond to the Complaint within 30 days of issuance of the summons, i.e., on or before January 29, 2010.

3. As of the date of this Request, February 1, 2010, the said Defendants have failed to plead or otherwise defend against the Complaint.

4. As such, the Clerk shall enter said Defendants' Default pursuant to Bankr. R. 7055 and Fed.R.Civ.P. 55(a).

WHEREFORE, Plaintiff requests that the Clerk enter Default against Defendants BROKER SOLUTIONS, INC., MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., and BAC HOME LOANS SERVICING, LP.

Dated: February 1, 2010.

Respectfully submitted,

/s/Daniel M. Press

Daniel M. Press, VSB# 37123
Russell B. Adams III, VSB# 37302
CHUNG & PRESS, P.C.
6718 Whittier Avenue, Suite 200
McLean, Virginia 22101
(703) 734-3800
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on this 1st day of February, 2010, I caused the foregoing Request to be served by first class mail, postage prepaid, on the Defendants and their counsel, addressed to:

BAC HOME LOANS SERVICING, LP
Attn.: David Perez, Assistant Vice President
BAC GP, LLC, General Partner
7105 Corporate Drive
Plano, TX 75024

Brian T. Moynihan, President
Bank of America, N.A.
As Managing Member of BAC GP, LLC
As General Partner of BAC HOME LOANS SERVICING, LP
101 S. Tryon St.
Charlotte, NC 28280

BAC HOME LOANS SERVICING, LP
7105 Corporate Drive
Mail Stop PTX-C-35
Plano, TX 75024

McCalla Raymer, LLC
National Bankruptcy Department
1544 Old Alabama Rd.
Roswell, GA 30076-2102

BROKER SOLUTIONS, INC.
d/b/a NEW AMERICAN FUNDING
c/o National Registered Agents, Inc.
526 King St.
Alexandria, VA 22314

Sharon Hortskamp. Reg. Agt.
Mortgage Electronic Registration Systems Inc.
1818 Library Street Ste. 300
Reston VA 20190

/s/Daniel M. Press
Daniel M. Press